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8 Attorneys for the United States Dept. of the Interior

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10 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

11 KMI ZEOLITE, INC.; and ROBERT E.
FORD,

12 Plaintiffs,

13 v.

14 UNITED STATES DEPT. OF THE
INTERIOR; *et al.*,

15 Defendants.

16 Case No.: 2:15-cv-2038-MMD-VCF

17
18 UNITED STATES DEPT. OF THE
INTERIOR,

19 Counterclaimant,

20 v.

21 KMI ZEOLITE, INC.; ROBERT E. FORD;
and R.A.M.M. CORP.,

22 Counterclaim Defendants.

23
24 **JOINT PROPOSED**
BRIEFING SCHEDULE

25 Plaintiffs KMI Zeolite, Inc. (KMI) and Robert Ford (Ford), and the Federal Defendants, by
their undersigned counsel, as requested by the Court in open court on March 2, 2018, hereby present
their joint proposed briefing schedule for this case:

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1. Briefing on the APA issues in the *KMI Zeolite* case shall be as follows:

2. Plaintiffs KMI's and Ford's motions for summary judgment and supporting briefs due: April 9, 2018

3. Briefs in response to all motions for summary judgment due: May 9, 2018

4. Reply briefs in support of summary judgment due: June 8, 2018

5. Initial Disclosures due: 30 days after order disposing of APA issues in *KMI Zeolite*

6. Amendment of Pleadings due: 30 days after Initial Disclosures

7. Fact Discovery closes: 180 days after Initial Disclosures

8. **5. Expert Discovery:**

9. a. Last day to designate Plaintiffs' experts: 30 days after fact discovery close

10. b. Last day to designate Defendant's experts: 60 days after fact discovery close

11. c. Last day to designate rebuttal experts: 90 days after fact discovery close

12. c. Last day to complete expert discovery: 120 days after fact discovery close

13. **6. Dispositive Motions due:** 30 days after expert discovery close

14. **7. Pre-Trial Order:**

15. a. Last date to file if no dispositive motions are filed: 30 days after expert discovery close

16. b. Last date to file if dispositive motions are filed: 30 days after order resolving last dispositive motion

17. IT IS SO ORDERED.

18. Date: 3-5-2018

19. 
UNITED STATES MAGISTRATE JUDGE

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1 For the APA Plaintiffs:

2 /s/ Karen Budd-Falen
3 KAREN BUDD-FALEN
4 Attorney for KMI Zeolite, Inc.

5 /s/ Eric Dobberstein
6 ERIC DOBBERSTEIN
7 Attorney for Robert Ford

8 For the quiet title plaintiff:

9 /s/ Eric Dobberstein
10 ERIC DOBBERSTEIN
11 Attorney for ABC Recycling Industries, Inc.

For the Federal Defendants:

DAYLE ELIESON
United States Attorney

/s/ Roger Wenthe
ROGER W. WENTHE
Assistant United States Attorney

For the quiet title defendant:

/s/ Michael Stoberski
MICHAEL STOBERSKI
Attorney for R.A.M.M., Inc.

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing document was served on the persons shown, by the method shown, on the date shown.

CM/ECF

All counsel of record

Dated: March 5, 2018

/s/ Roger W. Wenthe
ROGER W. WENTHE
Assistant United States Attorney